

## REMARKS

Claims 1-18 were examined. All claims were rejected. In response to the above-identified Office Action, Applicant amends claims 1, 2, 4, 7, 9, 13 and 15-17, and cancels claims 3, 8 and 12. Reconsideration of the rejected claims in light of the aforementioned amendments and the following remarks is requested.

### I. Claims Objected To Under 37 CFR 1.75

The Examiner objected to claim 1 under 37 CFR 1.75 on the grounds that its wording was unclear. Applicant has amended claim 1 as suggested by the Examiner, and respectfully requests that this objection be withdrawn.

### II. Preface To Discussion Of Rejected Claims

The Examiner rejected most pending claims under 35 U.S.C. § 102(e) as anticipated by U.S. Patent Application US 2003/0229441 by Pechatnikov *et al.* ("Pechatnikov") and/or U.S. Patent No. 6,430,498 issued to Maruyama *et al.* ("Maruyama"). Pechatnikov discloses a dynamic navigation system using a global positioning system (GPS) unit, where a server transmits information to a mobile unit, permitting the unit to display a map of its surroundings. Maruyama discloses a similar system wherein a server transmits information to portable terminal, enabling the terminal to display maps, directions, and other information about its surroundings. Both Pechatnikov and Maruyama discuss communication bandwidth and mobile-unit processing power constraints, and suggest means to reduce the amount of data that must be transmitted from server to client, and to reduce the computational load on the client. (See, e.g., Pechatnikov at ¶ 7 and Maruyama at col. 1, lines 47-50.)

Yet despite the specific consideration of these technical issues, neither Pechatnikov nor Maruyama teach or suggest the technique depicted in Applicant's specification figure 2, steps S203 and S205, described at page 9, lines 17-23, and set forth in independent claims 1, 9, 13, 15 and 17. The technique of setting the coordinates of the GPS terminal's location as an origin, calculating difference values between the origin and the coordinates of geographical features, and transmitting those values to the GPS terminal, reduces the amount of data that must be sent from the server to the terminal and prevents wasteful use of communication network resources. That technique is explicitly incorporated into the limitations of each of the independent claims (claim 1 at b) and c); claim 9 at b) and e); claim 13 at ¶¶2-3; claim 15 at ¶ 5; and claim 17 at ¶ 5), and

is not taught or suggested by the references of record. Consequently, Applicant respectfully requests that the Examiner withdraw each of the claim rejections discussed in detail below, and allow the pending claims.

### **III. Claims Rejected Under 35 U.S.C. § 102(e)**

The Examiner rejected claims 1, 2, 4-11 and 13-19 under 35 U.S.C. § 102(e) as anticipated by *Pechatnikov*. In order to anticipate a claim, the reference must disclose every limitation of the claim. For the reasons discussed below, Applicant believes that *Pechatnikov* fails to disclose every limitation of the rejected claims.

As to claim 1, that claim recites a method including the steps of setting up the received coordinates of the current location of the GPS terminal as an origin, and generating location information having coordinates of the geographical features adjacent to the GPS terminal by calculating difference values between the origin and the coordinates of geographical features. The claim as currently amended clarifies the method disclosed in Figure 2 and detailed in the specification at page 9, lines 17-23. No origin setting is taught by *Pechatnikov*, and the claimed method of generating location information is not disclosed either. Instead, *Pechatnikov* teaches transmitting “vector information” from the server to the client (*see ¶¶ 8, 13 and 141*).

Little detail is provided on the specifics of this “vector information,” but paragraph 137 states that the coordinates of a feature are transmitted – apparently without further processing – to the client after the feature is located, while paragraph 168 teaches “scal[ing] from the native map coordinates (such as GIS latitude and longitude coordinates) to pixel coordinates, corresponding to the pixels on the screen of the client device.” Thus, *Pechatnikov* teaches or suggests at least two different possibilities for the vector information transmitted to the client, but *neither* is the same as Applicant’s claimed difference values between the origin and the coordinates of geographical features.

Applicant respectfully submits that *Pechatnikov* fails to teach at least the origin setting and difference calculation of claim 1, and therefore fails to anticipate the claim. For at least these reasons, Applicant requests that this rejection be withdrawn.

As to claims 4, 13 and 15, those independent claims were rejected as anticipated by *Pechatnikov*. Applicant has amended claims 4, 13 and 15 to include limitations similar to those discussed in relation to claim 1: the GPS server sets up the received coordinates of the current location of the GPS terminal as an origin and calculates difference values

between the origin and the coordinates of geographical features. No such origin setting and difference calculation is discussed in *Pechatnikov*, so Applicant respectfully submits that the reference fails to anticipate claims 4, 13 and 15. The Examiner is requested to withdraw these rejections.

As to claims 7, 9 and 17, those independent claims were rejected as anticipated by *Pechatnikov*. Applicant has amended claims 7, 9 and 17 to include a limitation similar to that discussed in relation to claim 1: the GPS terminal receives difference values between the coordinates of its current location and the coordinates of the geographical features adjacent to the GPS terminal. *Pechatnikov*'s client, on the other hand, receives vector information from the server, which may be raw GIS latitude/longitude coordinates or screen pixel coordinates, but is nowhere suggested to be difference values between the location of the GPS terminal and the coordinates of geographical features. Applicant respectfully submits that *Pechatnikov* fails to teach all the limitations of claims 7, 9 and 17, and therefore fails to anticipate those claims. For at least that reason, Applicant requests that these rejections be withdrawn.

As to claims 2, 5, 6, 10, 11, 14, 16, 18 and 19, those claims depend upon one of claims 1, 4, 7, 9, 13, 15, and 17, and are patentable for at least the reasons advanced in support of their respective base claims. For at least those reasons, Applicant respectfully requests that the rejections of these claims be withdrawn.

#### **IV. Claims Rejected under 35 U.S.C. § 102(e)**

The Examiner rejected claims 1, 2, 4-11 and 13-19 under 35 U.S.C. § 102(e) as anticipated by U.S. Patent No. 6,430,498 issued to Maruyama *et al.* For the reasons discussed below, Applicant believes that *Maruyama* also fails to anticipate the rejected claims.

As to claim 1, that claim recites a number of steps comprising a method for providing location information in a GPS server, including setting up the received coordinates of the current location of the GPS terminal as an origin and generating location information having coordinates of the geographical features adjacent to the GPS terminal by calculating difference values between the origin and the coordinates of geographical features. These limitations are simply not present in *Maruyama*, which invariably speaks merely of transmitting "information" (such as "location information," "route information," or information about "movies, entertainment and business events, restaurants, etc.") from a server to a portable terminal. *Maruyama* mentions several

times that the portable terminal *represents* location information by latitude/longitude or coordinates and an altitude (*see* col. 4, lines 6-9 and col. 5, lines 51-53), but details of the “location information” *transmitted* to the portable terminal are not clear. Because *Maruyama* fails to teach the steps of setting up the received coordinates of the current location of the GPS terminal as an origin and generating location information by calculating difference values between the origin and adjacent geographical features, Applicant respectfully submits that claim 1 is not anticipated by *Maruyama* and requests that the rejection be withdrawn.

As to claims 4, 13 and 15, those independent claims were rejected as anticipated by *Maruyama*. Applicant has amended claims 4, 13 and 15 to include limitations similar to those discussed in relation to claim 1: the GPS server sets up the received coordinates of the current location of the GPS terminal as an origin and calculates difference values between the origin and the coordinates of geographical features. No such origin setting and difference calculation is discussed in *Maruyama*, so Applicant respectfully submits that the reference fails to anticipate claims 4, 13 and 15. The Examiner is requested to withdraw these rejections.

As to claims 7, 9 and 17, those independent claims were rejected as anticipated by *Maruyama*. Applicant has amended claims 7, 9 and 17 to include a limitation similar to that discussed in relation to claim 1: the GPS terminal receives difference values between the coordinates of its current location and the coordinates of the geographical features adjacent to the GPS terminal. *Maruyama*’s portable terminal, on the other hand, receives information (including “location information”) from the server, but the details of the “information” are not specified. The absence of a teaching or suggestion to calculate difference values between the GPS terminal’s location and the coordinates of nearby geographical features makes *Maruyama* an ineffective reference for the rejection under 35 U.S.C. § 102(e) of claims 7, 9 and 17. For at least those reasons, Applicant requests that these rejections be withdrawn.

As to claims 2, 5, 6, 10, 11, 14, 16, 18 and 19, those claims depend upon one of claims 1, 4, 7, 9, 13, 15, and 17, and are patentable for at least the reasons advanced in support of their respective base claims. For at least those reasons, Applicant respectfully requests that the rejections of these claims be withdrawn.

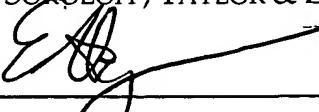
**V. Claims Rejected Under 35 U.S.C. § 103(a)**

The Examiner rejected claims 3 and 12 under 35 U.S.C. § 103(a) as unpatentable over *Pechatnikov* in view of U.S. Patent No. 6,718,237 issued to Murray *et al.* ("Murray"), and also unpatentable over *Maruyama* in view of *Murray*. Applicant has canceled claims 3 and 12, so these rejections are moot.

## CONCLUSION

In view of the foregoing, it is believed that all claims now pending, namely claims 1, 2, 4-7, 9-11 and 13-18, patentably define the subject invention over the prior art of record, and are in condition for allowance and such action is earnestly solicited at the earliest possible date. If the Examiner believes that a telephone conference would be useful in moving the application forward to allowance, the Examiner is encouraged to contact the undersigned at (310) 207-3800.

Dated: 11/9, 2004 Respectfully submitted,  
BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN, LLP

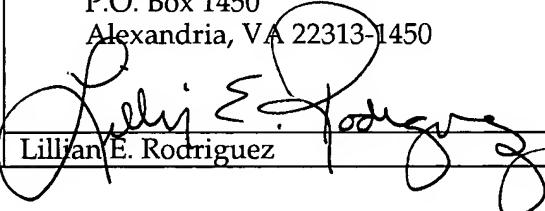
  
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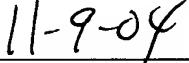
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November 9, 2004